

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

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In the Matter of

Numbering Resource Optimization

To: The Commission

CC Docket No. 99-200

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

MOTION FOR EXTENSION OF TIME

Winstar Communications, Inc. ("Winstar"), through the undersigned and pursuant to Section 1.46 of the Commission's rules,¹ hereby requests that the Federal Communications Commission ("FCC") extend the filing deadline for the Numbering Resource Utilization/Forecast Report, FCC Form 502, that the FCC adopted in the *Report and Order and Further Notice of Proposed Rulemaking* ("Report and Order") in the above-captioned proceeding.² Specifically, Winstar requests that the FCC grant a 120 day extension so that the company can file a complete and accurate FCC Form 502 no later than December 1, 2000. Winstar believes that the requested extension would ultimately result in data being made available to the North American Numbering Plan Administrator ("NANPA"), the FCC and the states in a usable form more quickly and accurately than if carriers are required to meet the current filing deadline.

Winstar does not believe that it is likely that the system NANPA is developing that will allow NANPA to receive, organize and analyze the data that carriers submit will be ready in time to accept carriers' data automatically on August 1, 2000. Since the automated processes for collecting and analyzing the data is not expected to be completed prior to August 1, 2000, each carrier must either manually prepare and file the report – whether on paper or in an electronic spreadsheet – or create and submit its own Electronic File Transfer ("EFT") format, which may or may not be consistent with the format that NANPA requires or that other carriers have developed. Additionally, since the automated systems will not be ready, NANPA must store the data that it receives until the system for organizing and

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¹ 47 C.F.R. § 1.46.

² *Numbering Resource Optimization*, Report and Order and Further Notice of Proposed Rulemaking, CC Docket No. 99-200, FCC 00-104 (rel. March 31, 2000).

analyzing the data has been completed and rely on manual processes to load most, if not all, of the data into the new system.

As a result of the delay in publication of FCC Form 502, Winstar has not completed the development and implementation of internal systems for automatically gathering, processing, and reporting the data requested in FCC Form 502 to NANPA. Unless the deadline is extended, Winstar must manually process this data and this manual process is costly, time consuming, and labor intensive. Furthermore, since the process would be manual, there is a greater risk of human error that will affect the validity of the data.

Winstar respectfully submits that a 120 day extension of the reporting deadline would better serve the public interest in assuring the submission of complete and accurate information regarding the demand for, and utilization of, numbering resources than would adherence to the existing August 1, 2000 deadline.³ An extension of the reporting deadline would provide necessary additional time to allow NANPA to complete development and implementation of a system for the electronic transmission, organization, recording and processing of number utilization data and transmit a standardized EFT format to carriers well before the filing deadline. An extension would also provide the time necessary for carriers to complete development and implementation of internal systems for automatically gathering, processing, and reporting the data requested in FCC Form 502 to NANPA.

An extension of the filing deadline would significantly reduce the costs and administrative burden that the reporting requirements impose on NANPA and the carriers, and help ensure that NANPA will be able to organize and analyze the data in a timely and useful manner. An extension would ultimately result in the requested data being made available to NANPA, the FCC and the states in a usable form more quickly than if carriers are required to meet the current filing deadline, because NANPA

³ See, e.g., *Federal State Joint Board on Universal Service*, Order, 13 FCC Rcd 20363 (1998) (extending a filing deadline based on finding that extension would significantly reduce the burden on respondents and help ensure that responses are accurate and complete); *Local Exchange Carriers' Rates, Terms, and Conditions for Expanded Interconnection Through Physical Collocation for Special Access and Switched Transport*, Order, 12 FCC Rcd 12042 (1997) (extending tariff revision filing deadline based on finding of good cause).

and the carriers would be able to reduce the amount of manual data processing, which leads to errors and slows the processing time. An extension would also help ensure that responses are accurate and complete, which is particularly important since this first round of reports will provide the foundation for subsequent numbering optimization measures and the database on numbering utilization. Moreover, an extension of time would also alleviate potential concerns regarding the sufficiency of notice, and give the FCC and NANPA an opportunity to ensure that there are no additional errors in the FCC Form 502.

CONCLUSION

For the foregoing reasons, Winstar respectfully requests that the FCC grant a 120 day extension so that carriers can work in good faith to file FCC Form 502 no later than December 1, 2000.

Respectfully submitted,

WINSTAR COMMUNICATIONS, INC.

A handwritten signature in black ink, reading "Russell C. Merbeth / 700", is written over a horizontal line.

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DATED: July 17, 2000

CERTIFICATE OF SERVICE

I, Tracey Sorenson, hereby certify that on this 17th day of July, 2000, I have caused a copy of the foregoing "Motion for Extension of Time of Winstar Communications" to be hand delivered to the following:

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